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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**COPY**

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ESTER LORUSSO,

Plaintiff,  
-against- Civil Action No.  
1:07-CV-03583

ALITALIA-LINEE AEREE ITALIANE, SpA,

Defendant.  
-----x

April 18, 2008  
10:09 a.m.

Videotaped Deposition of ANDREA SCIARRETTI,  
taken by Plaintiffs,, at the offices of The  
Ottinger Firm, PC, 19 Fulton Street New York,  
New York, before SUZANNE PASTOR, a Shorthand  
Reporter and Notary Public within and for the  
State of New York.

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company.

Q. That's what Mr. Libutti told you?

A. Yes.

Q. Did you say anything to him when he said he wanted to do that?

A. Sorry?

Q. Did you say anything to him when he told you that he wanted to do that?

A. Yes, I told him that this was illegal.

Q. And what did he say?

A. He said I don't care, I need to make this plan and I will go on with like that.

Q. Would that plan that Mr. Libutti explained to you have an impact on Ester LoRusso?

A. Yes.

Q. How so?

A. How?

Q. How?

A. Okay. Because Ms. LoRusso was one of the colleagues in the senior positions in the company, and it was long seniority in the company. So he wanted to let out anyone with

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And after the interviews with the senior -- with me and the senior sales director, Mr. Marcello Grimaldi, he told me the guy was fine for the position, very good.

I told Mr. Libutti that I wanted to hire Mr. Alton Watt. Then on the same day he came back to my office and tell me he wasn't comfortable with hiring Mr. Alton Watt because he was black. He had an eye defection and he thought that he was gay so it could create some problem in the future to the company.

And nevertheless, I hired Alton Watt because I asked him if the guy was fine with the position and if he was in line, and he said that he was in line and so I hired Mr. Alton Watt.

Q. Were any other comments made by Mr. Libutti to you or that you heard regarding women or minorities working with him or under him in New York?

MR. KORAL: Objection.

A. Well, we had some meetings. For example, Ms. LoRusso didn't agree with this position. He felt like it was a personal

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A. Because he used to complain against the U.S. lawyers and regulations because he felt that it was too rigid and too difficult to manage for his way of managing. And so he started -- on the first period he seemed to be more worded about this regulation --

### 9. More what?

A. More awareness, sorry, about this regulation. Then he used to say he didn't care if someone could write or complain against his way of attitude or behavior because he didn't care at all because he was the boss of North America and Mexico so he could do as he wanted, so he didn't care of the regulations.

Q. How do you know that?

A. He told me

Q. When did he -- will you please explain?

A. Yes, he told me that he was too tired of the rigid regulation of the United States. At the end, let the people write or complain, I don't care.

Q. When you say regulation, what regulation are you referring to?

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A. Internal the company, external by the U.S. laws. Any kind of laws that we should apply working in USA.

Q. You're referring to the antidiscrimination laws?

A. Antidiscrimination, harassment, internal climate. Anything that could be related to the human resources management, so the approach and the management with the people.

Q. How do you know he felt this way?

MR. KORAL: Objection.

A. Because he told me.

Q. How many times?

A. Several times. Specifically at the end, at the end, until August, until I was in the offices, the last months he didn't care at all. So he was used to repeat this on several occasions to me.

Q. Was there a concern that the decision to remove Ms. LoRusso from her position at Alitalia might violate the American antidiscrimination laws?

MR. KORAL: Objection.

A. If he understood -- if he felt that

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he didn't like her approach, her way to reply to him. But we didn't have a chance to discuss about the position of Ms. LoRusso until he wanted to have this reorganization plan.

Q. Explain about his reorganization plan. What was he doing?

A. The reorganization plan, what introduced me verbally because I didn't see anything or I didn't sign or approve anything about the reorganization plan. Simply wanted to have a firing or a termination of the old people in the company, especially in the higher positions and to replace them with new managers, new appointed people. That was the core of the project.

Q. Did he show you any documents that related to his plan to do this?

A. No, not in the discussions. no.

Q. How many times did you discuss this plan with him?

A. Just in the locations.

Q. Just what?

A. Just when he came to my office and told me that he wanted to have this organization

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manage because it wasn't in line with his way. And so he really felt as a personal insult for him to have a dialogue with her when she wasn't in line with him.

Q. How was her gender a factor in that?

MR. KORAL: Objection.

Q. If you know,

A. Was gender? Probably, yes. He told me I don't like her, especially as a woman in high position.

Q. Were any comments made about just women in general in high positions?

MR. KORAL: Objection.

A. Generally, he told me that he didn't like the idea of having women in high position.

Q. Were there any -- as the human resources director, in your discussions with your supervisor, Mr. Libutti, were there any times that you discussed the possibility of promoting a woman to a higher position?

MR. KORAL: Objection.

A. No, he didn't tell me anything. He